

ADAM PAUL LAXALT
Attorney General
Clark G. Leslie (Bar. No. 10124)
Chief Deputy Attorney General
Theresa M. Haar (Bar. No. 12158)
Deputy Attorney General
State of Nevada
Office of the Attorney General
555 E. Washington Ave., Ste. 3900
Las Vegas, NV 89101
(702) 486-3792 (phone)
(702) 486-3773 (fax)
thaar@ag.nv.gov

Attorneys for Defendants
James "Greg" Cox, Timothy Filson,
Dwight Neven, and Ronald Oliver

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

VICTOR PEREZ, as Special
Administrator of the Estate of CARLOS
PEREZ, deceased; VICTOR PEREZ, as
Guardian Ad Litem for S.E.P., a minor;
VICTOR PEREZ, as Guardian Ad Litem
for A.I.P., a minor,

Plaintiffs,

vs.

STATE OF NEVADA, ex.rel. NEVADA
DEPARTMENT OF CORRECTIONS;
DIRECTOR GREG COX, individually;
WARDEN DWIGHT NEVEN,
individually; ASSISTANT WARDEN
TIMOTHY FILSON, individually; COT.
RAMOS, individually; LIEUTENANT
OLIVER, individually; CORRECTIONS
OFFICER CASTRO, individually;
CORRECTIONS OFFICER SMITH,
individually; and DOES I-X, inclusive; and
ROES I-X, inclusive,

Defendants.

CASE NO. 2:15-cv-01572-APG-CWH

**STIPULATION AND ORDER
TO EXTEND TIME
(First Request)**

Plaintiffs, Victor Perez, as Special Administrator of the Estate of Carlos Perez,
deceased; Victor Perez, as Guardian Ad Litem for S.E.P., a minor; and Victor Perez, as
Guardian Ad Litem for A.I.P., a minor, by and through counsel Cal Potter; Defendants

1 State of Nevada ex rel. Nevada Department of Corrections, James Greg Cox, Timothy
2 Filson, Dwight Neven, and Ronald Oliver, by and through counsel, Adam Paul Laxalt,
3 Attorney General of the State of Nevada, and Theresa M. Haar, Deputy Attorney
4 General; Defendant Isaiah Smith, by and through counsel Jeffrey Barr; Defendant Jeff
5 Castro, by and through counsel Craig Anderson; and Defendant Raynaldo-John Ramos,
6 by and through counsel, Robert Freeman, hereby stipulate as follows:

7 On September 29, 2016, a telephonic status conference was held. See ECF No. 74.
8 It was determined that if the matter does not settle at the upcoming status conference,
9 Plaintiffs will have two weeks to file their Amended Complaint. *Id.* On October 3, 2016,
10 Plaintiffs filed their Amended Complaint. ECF No. 75. All parties hereby stipulate that
11 Defendants will have two weeks from the date of the Settlement Conference to Answer or
12 otherwise respond to Plaintiff's Amended Complaint.

13 The parties here state that there is good cause for the extension. The parties are
14 scheduling a Settlement Conference in an attempt to resolve this matter, and believe it
15 would conserve judicial resources to extend the time for Defendants to respond to
16 Plaintiff's Amended Complaint. The parties have met and conferred on the matter, and
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stipulate to extend the time to respond to Plaintiff's Amended Complaint until two weeks after the conclusion of the Settlement Conference.

Dated: October 20, 2016

POTTER LAW OFFICES

/s/ C. J. Potter, IV
Cal J. Potter, III, Esq.
C. J. Potter, IV, Esq.
Attorneys for Plaintiffs

Dated: October 20, 2016

ADAM PAUL LAXALT
Nevada Attorney General

/s/ Theresa M. Haar
Clark G. Leslie
Chief Deputy Attorney General
Theresa M. Haar
Deputy Attorney General
Attorneys for Defendants
Cox, Filson, Neven, and Oliver

Dated: October 20, 2016

LEWIS, BRISBOIS, BISGAARD,
& SMITH, LLP

/s/ Robert W. Freeman
Robert W. Freeman, Esq.
Attorneys for Defendant
Raynaldo-John Ramos

Dated: October 20, 2016

ASHCROFT & BARR

/s/ Jeffrey F. Barr
Jeffrey F. Barr, Esq.
Attorneys for Defendant
Isaiah Smith

Dated: October 20, 2016

MARQUIS AURBACH COFFING

/s/ Craig S. Anderson
Craig S. Anderson, Esq.
Attorney for Defendant
Jeff Castro

IT IS SO ORDERED.

Dated this 21st day of October, 2016.


UNITED STATES MAGISTRATE JUDGE